

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

YASIN SAMAD ALI COX

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

CONFIL USA, -v-
CYNNE COOKE
KEITH RIDER, KESTON LOCKHART
ERIC COX

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. CIV-23-504-R

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☐ No

FILED

JUN 07 2023

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT. WESTERN DIST. OKLA.
BY naa DEPUTY

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

YASIN COX

Street Address

1602 NW Taft Ave

City and County

Lawton, Commanche

State and Zip Code

Oklahoma 73507

Telephone Number

580-917-7092

E-mail Address

COX YASIN@Y2HOO.COM

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Keith Rider
 Job or Title (if known) CAMFIL USA, Inc Oklahoma W./Red Bud
 Street Address 5455 S. 99th E. Ave
 City and County Tulsa
 State and Zip Code Oklahoma ~~73159~~ 74146
 Telephone Number (918) 627-4106
 E-mail Address (if known) Keith.rider@camfil.com

Defendant No. 2

Name Leaton Lockhart
 Job or Title (if known) Territory Sales Manager, Camfil USA Inc
 Street Address 5455 S. 99th East Ave
 City and County Tulsa
 State and Zip Code Oklahoma ~~73159~~ 74146
 Telephone Number 918-991-8858
 E-mail Address (if known) LeatonLockhart@camfil.com
Red Bud Filter Sales and Service

Defendant No. 3

Name Eric Coy
 Job or Title (if known) Camfil USA Inc / Red Bud
 Street Address 5455 S. 99th East Ave.
 City and County Tulsa
 State and Zip Code Oklahoma 74146
 Telephone Number
 E-mail Address (if known) Eric Coy@Camfil.com

Defendant No. 4

Name Lynne Laake
 Job or Title (if known) Director of Marketing Camfil USA
 Street Address 807 Indian Lakes Blvd.
 City and County Clarksville
 State and Zip Code Ohio 45113
 Telephone Number (513) 774-9493
 E-mail Address (if known)

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

☒ Federal question

☐ Diversity of citizenship

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Title VII, 42 U.S.C. 2000e. Civil Rights Act of 1964
 17 U.S.C. 506 (a) Infringement on Intellectual Property
 18 U.S.C. 2319 [18 U.S.C. 1832- Theft of Trade Secrets
 18 U.S.C. 921 ART. 121. Larceny and wrongful appropriation

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

- a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

- b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

- a. If the defendant is an individual

The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

The Intellectual property that has been stolen will immediately stop further Global Warming if put in Public Use nationally and internationally

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Lynne Lake referred me to Keith Rider. Keith Rider referred me to Keaton Lockhart. Keaton would answer my calls and emails immediately or in a reasonable amount of time for 7-8 1/2 months until I submitted my Intellectual Property to him for a prototype.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I have not gotten a phone call or email since I submitted my intellectual property to Lockhart and that was 9 months ago. I reached out to them numerous times but no response. I can only think the worst because of this. The importance to humanity my invention has is why they have stolen my secrets. Everybody they have employed worldwide since 1963, their engineers, vendors and Partners have come up with this invention. This is why they are stealing

III. Statement of Claim (Cont.)

1. Keaton Lockhart acted as if he was accepting my Intellectual property for art search, ^{working} model production and possible licensing agreement but did none of these.
2. He emailed me a very deceptive NDA and when I called him to Amend it, he never answered or responded to my emails.
3. He did not give me the same ^{equal} opportunity to receive services like other businesses, vendors, inventors and engineers that ~~CamFi~~ CamFi works with and manufacture items for.
4. He, Keaton Lockhart and CamFi are misusing my Trade Secrets without my permission.
5. CamFi have stolen my Trade Secrets, made me lose my provisional Patent and an opportunity to file

IV. RELIEF (Cont.)

A Utility Patent. This has cost me more than I could actually figure. Because I submitted to CamFi was an invention that is nowhere in the world according to, ^{Professional U.S.P.T.O. Lawyer} Art Searchers and it will stop Global Warming from continuing and cease to exist as soon as it's made. It only take 2 weeks to produce if that long. CamFi Had this technology of mine for months, how much do you think I should request? The Damages are irreversible and immense to me, my family and Humanity. Humanity? Because if it comes out before I can put it out, Good. But CamFi may not want to let it ~~reach~~ ^{reach} Humanity and sabotage it. I think 5 Billion Dollars is OK for now. They paid 850 million to 700 workers. None of them thought

I would be violated and hurt if Camfil release my intellectual property to ^{the} public without my permission. But I truly want to help the planet.

① Camfil needs to setup diversity programs at their many facilities and receive other disciplinary actions to prevent them from practicing racist illegal business in America.

② They should immediately stop whatever they have done or are doing with my intellectual property here and internationally.

③ Camfil pays out Billions of Dollars ^{yearly} to their 4500 workers. None of the 4500 workers have brought an invention to their company of this magnitude and because of them stealing it from me to prevent it from reaching humanity or they are attempting to sell or create what is in my trade secrets before I can. Are the reasons why I'm asking for 5 Billion Dollars U.S. currency.

④ This is disgusting, unacceptable and shows how Company's here in Oklahoma works together with U.S. Attornies and other lawyers to steal from unknowing clients of theirs. This must change! and if the programs and companies that hold a public trust aren't stealing, then they are not allowing access or opportunities to reach a segment of the OKLA population because they discriminate against people because of RACE!

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 6-7-23

Signature of Plaintiff

Printed Name of Plaintiff

Y. J. Cox
Y. J. Cox

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address